

## **Benzotriazole Category - Comments of Environmental Defense**

(Submitted via Internet 6/14/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Benzotriazole Category.

The Benzotriazoles Coalition of the Synthetic Organic Chemical Manufacturers Association (SOCMA) proposes that three related chemicals be considered as a category for purposes of the EPA's High Production Volume Chemical Challenge Program. On review of the Robust Summary/Test Plan submitted for these chemicals, 1-H-benzotriazole (CAS# 95-14-7), 1-H-benzotriazole, 4 or 5 methyl (CAS# 29385-43-1) and 1-H-benzotriazole, 4 or 5 methyl, sodium salt (CAS# 64665-57-2) we observed that these chemicals are both structurally similar and induce similar patterns of toxicity. Therefore, we support their consideration as a category. We also note that the Robust Summary is well organized and results described therein are accurately and concisely summarized in the Test Plan.

Unfortunately, although the sponsors have submitted a solid robust summary and test plan as noted above, the cover letter expressly states that the sponsors will not proceed with testing until and unless EPA promulgates a test rule for this category of compounds. As a result, the sponsors are effectively withdrawing their commitment under the HPV program. This is highly regrettable to say the least, and is inconsistent with the public commitment previously made by the sponsors. As this panel is operating under the auspices of SOCMA, this development also calls into question SOCMA's commitment to the HPV initiative.

Our technical comments on the robust summary/test plan are as follows:

1. A minor point, but two of the chemicals are variously referred to as 1-H-benzotriazole, 4 or 5 methyl and 1-H-benzotriazole, 4 or 5 methyl, sodium salt or as the tolyl-triazoles. Although both chemical names are correct, we feel the document would be more clearly read by the lay public if the nomenclature were consistent throughout the document.
2. Another minor point is that both the Robust Summary and Test Plan (page 5) indicate 1-H-benzotriazole, 4 or 5 methyl and 1-H-benzotriazole, 4 or 5 methyl, sodium salt are less toxic than benzotriazole because they have a greater molecular weight. It is more likely that they are less toxic because the methyl group of 1-H-benzotriazole, 4 or 5 methyl and 1-H-benzotriazole, 4 or 5 methyl, sodium salt is a primary site for metabolic oxidation. A similar difference accounts for lower toxicity of toluene versus benzene.
3. The Test Plan addresses worker exposure, but does not mention possible consumer exposure or the possibility of exposure of the general public or the environment in the event of a spill or other accident.

Note: Apparently due to "bugs" in the computer program, the Robust Summary/Test Plan can only be printed with difficulty. Further, significant portions of Tables 2, 3 and 4 of the Test Plan, including all data for benzotriazole, are blacked out. These data may be gleaned from the Robust Summaries, but that should not be necessary. It is not clear whether the problem is intrinsic to the Robust Summary/Test Plan as submitted, or whether this problem arose at the time the documents were posted to EPA's web site. In either event, this problem should be addressed by the EPA.

Thank you for this opportunity to comment.

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